The 'three pillars model of regulation': a fusion of governance models for private security

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Abstract

The growth in size, role and authority of private security has triggered a variety of regulatory reactions. These have stimulated a growing academic debate on preferred regulatory models. This paper summarizes the key existing models of regulation. It then provides a critique of the observations of Loader and White (2017) on the existing models. It critically examines their proposed model and outlines how we believe that private security regulation can be enhanced by setting out 'three pillars' of effective regulation. The literature and research points towards the need for a regulatory pillar that enhances the wider private security sector, a distributive pillar that addresses security inequality, and lastly a responsibility pillar designed to align the private security industry with the public interest.

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1. Introduction

The growth in size, role and authority of private security in many countries has triggered a variety of regulatory reactions (de Waard, 1993; Button 2007a; CoESS, 2011, 2015; Button 2012; Button & Stiernstedt, 2016). These, in turn, have stimulated a growing academic debate on these reactions and the most appropriate design of regulatory models. A 2015 paper by Loader and White (2017) analysed existing models of regulation by identifying two, while suggesting a third. Grouping several ideas together (many stemming from the authors of this paper), the existing models are labelled by Loader and White as 'cleansing' and 'communalizing', with a new (third) model entitled 'civilizing'.

Identifying the existing models and proposing a new model is a welcome addition to the growing literature on private security and regulation. Nevertheless, we argue that the deconstruction by Loader and White (2017) fails to capture both the sensitivities and comprehensiveness of the models they have critiqued, particularly when they are viewed together. There is, we posit, a need to paint a more nuanced picture, rather than to thrust the protagonists of regulatory change into distinct and narrow dichotomies. The model proposed by Loader and White, which they acknowledge is not the finished article, could be substantially expanded beyond the 'skeleton' framework offered. Indeed, it could be pushed in a slightly different direction – an idea that we will return to at the end of this paper.

Consequently, to nurture constructive collaboration between those with vested interests in the overall advancement of private security regulation, this paper will summarize the arguments of Loader and White. The following three sections will; first, critique the division into three models, particularly the association of the authors of this paper with the 'cleansing model'. Second, the paper will critique the 'civilizing model' that Loader and White propose. Third, the paper will seek to fuse some of these debates and ideas to create a new framework for the 'civilizing' model, which we refer to as the 'three pillars' model.

2. Loader and White: a summary

In 2017, Loader and White published a paper advocating what they refer to as a 'civilizing' model of regulation, where commodity and non-commodity values jostle and collide. They offered this model because it seeks to work with − rather than against − the market. In doing so they also

created a dichotomy between two other perspectives on regulation which they referred to as the 'cleansing' model and 'communal' model.

The rationale for yet another model for regulating private security arises out of Loader and White's view that both previous models are simply predicated on the same neoclassical interpretation of how the market works. Under this perspective, changes are only made when flaws appear in what is otherwise understood as 'good' economic behaviour. Loader and Walker (2007) had previously examined critiques of this interpretation, which they reject for three reasons; one, that competition may drive a proliferation of budget services and technologies (which may erode the wellbeing and safety of citizens); two, that unequal buying power and subsequent market access fuels inequality and may result in security resources being distributed inversely in relation to risk (see also Hope & Sparks, 2000); and, three, that commodifying security into contextually tailor-made discrete 'goods' chips away at the trust and solidarity required to guarantee the equal protection of all members of society (Loader & Walker, 2007). Here, commodification means allowing private security to function in ways that previously were covered by the public sector (police), and are now paid for by consumers. They therefore surmise that, for those reasons, the market for private security stands in tension with the democratic promise of security – that all members of society merit equal consideration regarding their security needs.

A summary of the three key perspectives (as they see them) is set out in Table 1 below. While there is an argument for commodification also having positive effects (see for example, Chang and Long, 2018) these results still involve an element of inequality, as purchasing power arguably remains at the forefront. Thus, this correlation between wealth and security must be regulated. The question is, how?

Loader and White also seek to create a regulatory space where non-contractual public values and commitments of market and non-market actors can be expressed, deliberated upon, and (if appropriate) institutionalized. Introducing the 'civilizing' model, Loader and White do not attempt to rebuild the regulatory landscape, but rather they add two specific regulatory goals, namely 'inclusive deliberation' and 'social solidarity.' By this they mean a regulatory structure that fosters connections between market transactions and members of the general community.

Table 1. Models of regulating private security (Loader & White, 2017).

	Cleansing Model	Communalizing Model	Civilising Model
Regulatory goal	Consumer choice; product quality	Market access; local capacity- building	Inclusive deliberation; social solidarity
Assumptions			
Conception of market	Neoclassical economic; amoral spaces of exchange	Neoclassical economic; amoral spaces of exchange	Economic sociology; moral spaces of exchange
Conception of public interest	Realized through market efficiency and enforcement of contractual relationships	Realized through market efficiency and enforcement of contractual relationships	Realized through public duty articulated outside of contractual relationships
Analysis			
Problems with security market	Low standards among sellers of security services and technologies; grudge purchasing	Unequal purchasing power among buyers of security services and technologies; governance/ security deficits	Social fragmentation in the democratic polity
Solutions			
Regulatory targets	Sellers	Buyers	Buyers and sellers
Conception of regulatory space	Centred	Centred and de-centred	Centred and de-centred
Regulatory mechanisms	Rules: licensing, standard-setting, codes of practice, monitoring	Rules and principles: local budgets, participation	Principles and rules: dialogue, delegation, and responsive regulation
Relation to/ conception of democracy	Background; representative	Foreground; local, participative	Foreground; deliberative
Relation to status quo	Conservative	Critical and reformist	Critical and reformist
Key writers	Button (2007a), Prenzler and Sarre (2008)	Johnston and Shearing (2003), Wood and Shearing (2007)	Loader and White (2017)

3. Challenging Loader and White's critique

We submit that there are deficiencies in the arguments of Loader and White. Let us begin by noting their primary observation:

> Upon surveying their body of work, it is immediately apparent that they [Button, Sarre, Prenzler] interpret the market for security and its relationship to the public interest through a textbook neoclassical economic lens. As long as buyers enter freely into the market and, following an informed appraisal of the services and technologies on offer, agree legally permissible terms and conditions with honorable sellers, no challenge to the public interest is generally seen to take place, regardless of whether or not the transaction erodes public values and commitments. Non-contractual moral concerns have no place in this model, either as a feature of market failure or as a motivator of human agency (Loader and White, 2017 pp. 171-172)

In particular, they offer the following critique of what they have called the 'cleansing' model, which they associate with us. They write:

> The cleansing model – which seeks to rid the market of deviant sellers in order to better serve the public interest – is the default position in the literature on private security regulation (p. 171).

It is fair to say that there are many regulatory systems that would fit the cleansing model. These are those that are built upon a 'light touch' idea of regulation, and whose *raison d'être* is solely to remove 'bad apples' from the private security sector, or to prevent them from entering it in the first place. This is a perspective common in many jurisdictions in the USA and advocated for the UK in 1996 (see Home Office, 1996; Hemmens et al, 2001; Bradley, 2016). However, this 'minimalist' position, as Button and George (2006) would describe it, is only part of the picture, and does not encapsulate our perspectives. Our work has sought to explain that regulation should do more than simply remove 'bad apples' from the security market. We seek to employ models that raise the standards of providers in nodes where they are used. We seek to improve the accountability of private security. We advocate to build into regulatory systems standards of training for operatives, codes of conduct, corporate compliance standards, and complaints procedures. We also emphasize

that the improvement of standards in private security can bring down crime, which is of benefit to all members of society, not just those persons who choose to employ security personnel.

Moreover, one must factor in the public interest when considering the operation of private security staff. This idea is recognised in another article by Loader and White (2018) entitled 'Valour for Money'. Here the issue of commodifying the security market is problematised, but no real solutions are offered, and regulation is referred to as "lines in the sand" (p. 1401). We argue, in contrast, that there is more to regulatory solutions than being just lines in the sand. An example is a guard failing to respond to an incident next to the space they protect. This is not automatically a negation of the public interest. The guard might not be properly trained to respond to such an incident, causing even more harm (clearly against the public interest) and endangering bystanders. Indeed, it might be a distraction to lure them from their post.

Thus the debate cannot be conducted around the oft-used simplistic dichotomy: the public police only serve the public interest and private security sector only the private interest. There are many examples of the public police ignoring specific groups and failing to serve the public interest, such as denying the human rights of certain racial minorities. Conversely, there are many examples of private security serving the public interest either through voluntary arrangements and statutory obligations, such as Project Griffin, Project Argus and third party policing (Mazerolle and Ransley, 2006) (to which we will return later in this paper). Finally, there are many cases of public goods delivered by private companies (banking services, telecommunications, electricity etc.) under appropriate regulatory frameworks that are serving the public interest.

Many of the arguments presented by Loader and White around public interest seem implicitly to focus upon residential security. They are concerned that initiatives such as gated communities (protected by private security) and the patrolling of public streets by private operatives challenge the public interest, and lead to greater security inequality. There is a body of evidence from South America, Africa and the USA where this is clearly observable (Blakely and Snyder, 1997; Huggins, 2000). However, protecting residential enclaves is a very small portion of the private security sector workload. Clearly there is an issue of how best to integrate such security measures into a broader policing landscape. But the diversity of contexts in which private security operate needs to be better recognized.

Button (2008) has, for instance, sought to identify the means by which society is able to reduce security inequality by advocating expenditures for more deprived communities (via a tax on private security – thus the 'security rich' subsidize the security poor). This could be done by the development of 'security unions' that are modelled on 'credit unions'[5] which provide banking services, rather than security, to the public. Security unions would include many of the poorer sections of the community using a 'mutuality' model of delivery. Sarre and Prenzler have also considered how to address security inequity. In their report, *Private security and public interest: Exploring private security trends and directions for reform in the new era of plural policing*, they highlight the problem of the growing gap in security between rich and poor. Sarre and Prenzler note, in this context, that a great deal of situational prevention is done by the security industry. They cite van Dijk's findings from the International Crime Victim Survey in relation to burglary prevention, that

> Across twelve Western nations the lowest income groups have stepped up their household security to a lesser extent than the middle and upper classes. They cannot afford to... the survey also shows that the lowest quartile has benefitted less from the falls in burglary victimization than the rest of the population (van Dijk, 2012, p. 17).

With this phenomenon in mind, van Dijk has argued that 'situational crime prevention is not just a matter of efficiency. It is also a matter of social justice' (p. 17). Moreover, in response to the problem of inequalities in situationally-based protections from crime, Prenzler and Wilson (2014, p. 17) have argued that:

> The cost of security can entail significant disadvantage. However, governments can address the problem of capacity to pay through subsidized security; as well as security in government housing, public transport, public hospitals and public schools.

Prenzler and Sarre (2014b) have also described a variety of security projects internationally that generated wide public interest benefits – including reduced victimization across a range of crimes, reduced financial and personal costs for potential offenders, reduced costs for taxpayers, and provided jobs for unemployed persons. More recently, Prenzler and Fardell (2016) reviewed a variety of domestic violence prevention programs involving private security operatives employing a range of preventative strategies. Many of these programs are operated by non-government

[5] See https://www.findyourcreditunion.co.uk/about-credit-unions/ for description of the nature and work of credit unions.

'charity'-based organizations that rely on a mixture of private and government funding. Programs included the contracting in of private security firms to provide upgraded home security through 'target hardening' of residences, and enhanced personal safety through mobile alarms (including pendant alarms and mobile phones). The more sophisticated programs involve a combination of private security monitoring and police priority rapid response. Effectiveness, according to the authors, appears to be closely related the operation of a 'victim centred' approach to assistance, including tailor-made security services. Success in security, they affirm, is premised on the private security firms being reputable operators, with their integrity and competency underwritten by government through an appropriate licensing system (see also Harkin & Fitz-Gibbon, 2016).

Loader and White also describe the model they critique as 'traditional state-centred command and control regulation' (p. 172), ignoring the emphasis on democratic state control in the Button/Prenzler/Sarre model, including the idea of extending democratically-based regulation through a range of inputs from diverse stakeholders and clearly integrating them in the regulatory system without enabling them to 'capture' it (Button, 2008; Prenzler and Sarre, 2008). Designing regulation on three governing pillars (see below) in contrast maintains a democratic balance and in doing so addresses regulatory capture (see Meehan and Benson, 2015) which must be avoided.

The 'decentred' model that White and Loader advocate purportedly draws on Ayres and Braithwaite's (1992) concept of 'responsive regulation' and Gunningham and Grabosky's (1989) concept of 'smart regulation' (White and Loader, 2017, p. 176). However, these are the two main sources for Prenzler and Sarre's concept of 'smart regulation', which includes the following key criterion (2008, p. 274):

> Development and administration of [security industry] legislation should be *consultative,* with standing industry and stakeholder committees advising the regulatory agencies. This will attract industry support for compliance and make best use of insider expertise. It will also provide a source of continuous feedback about the impact of regulation. A spin-off would be a check on under-enforcement by institutionalizing regulatory tri-partism involving all stakeholders such as government and opposition politicians, unions, employers, academics and consumer groups.

Smart regulation applied to the security industry includes the idea of the regulator holding a mission for research and professional development that examines impact measures and public benefits (Prenzler & Sarre, 2008).

In terms of democratic criteria, many successful crime reduction projects involving the security industry have operated through partnerships, with steering committees involving a range of stakeholders. Membership usually includes representatives from diverse communities of interest – although these are often professionally-based, such as police and business groups. Prenzler and Sarre have, however, also argued that the crucial take-away message from critical evaluations of crime prevention partnerships is that they 'need to be carefully managed, with a clear public interest benefit where public money is involved' (Prenzler & Sarre, 2014b, p. 786). This includes consultation with affected communities and monitoring of impacts. Appropriate democratically-oriented program management includes consultation and planning that also considers a range of risks to members of the public – including 'intrusive surveillance or harassment and excessive force by security officers' – with risks 'reduced or eliminated through appropriate licensing systems, training and supervision, monitoring, codes of conduct and procedural rules' (Prenzler & Sarre, 2014b, pp. 785-786). The 'partnership' model for optimizing the public benefits of private security therefore encourages input from a range of non-state actors consistent with the model advocated by White and Loader. At the same time, it needs to be emphasized that security partners need to be vetted to an acceptable level of professionalism through a proactive licensing regime operated by the democratic state, as this is beyond the scope of any program steering committee. Berg (2013) has also highlighted how local contractual arrangements can also facilitate strong governance.

4. The 'civilizing' model

We now turn to examine the key aspects of the Loader and White model and how these may be utilized in developing what we consider to be the 'three pillars' of regulation. We first look at their terms: 'inclusive deliberation' and 'social solidarity.'

Inclusive deliberation

'Inclusive deliberation' is defined by Loader and White as 'the process of sustaining an open dialogue, in which all parties whose everyday lives are affected by the market for security are given the opportunity to explore how the market impacts upon their public values and commitments'

(2015, p. 14). Their idea is two-fold. One, the public regulator delegates the responsibility for addressing security deficiencies to the institutions that have the appropriate reach, and, two, this process of delegation must be mediated through memoranda of understanding (MoUs). The terms of the MoUs should be agreed to by all institutions involved in a particular regulatory response.

We maintain that there are already many examples of how deliberations take place to meet public demands through existing state governance structures and contractual structures (Sarre and Prenzler, 2011; Berg, 2013; Berg et al., 2014; and Berg and Shearing, 2015). Given that private security partly, and arguably primarily, is a commercial endeavour, and thus focused on sometimes narrow interests and profit, many companies bring together various players to form partnerships. This fosters effectiveness by resource and policy alignment as well as societal resilience by asset inter-operability. The former usually plays into the hands of the public interest and the latter, by its very definition, always does.

We also believe that the focus upon trade associations as agents who can 'translate the content of relevant MoUs into these hard and soft regulatory mechanisms in order to project the principles of inclusive deliberation and social solidarity to sellers on the ground' (Loader and White, 2017, p. 180), would have only limited success. As Loader and White rightly note, such bodies are influential (certainly the British Security Industry Association in the UK context) as they focus upon their members and generally national issues related to private security firms not nodal security arrangements. We believe that, moreover, for inclusive deliberation and social solidarity to work, it would need to address both national and nodal (local) levels. If the aim is to foster the public interest and reduce security inequity, at a national level the associations representing security managers would be equally if not even more important, as they buy private security, set the contractual standards and ultimately decide what the private security contractors should do (for a nodal context illustrating this see Button, 2007b). Therefore, focusing upon the UK, the Security Institute and the American Society for Industrial Security would be as equally important if not more important than the British Security Industry Association.

The nodal level, whether residential areas, malls or leisure parks, would also need to develop such deliberations tailored to local needs and would necessitate agents important to influencing security within them. These can be highly influential and effective through both state and private structures (see Berg 2013; Berg et al, 2014). For instance, imagine a shopping mall adjacent to a deprived housing estate with poor security. There might be times of the day where the security

force of the mall is under-utilized and some staff could be offered to patrol the adjacent estate to provide reassurance to that community. If there is an incident and the police require support, the mall offers private personnel – if the resources are there – to support the police. This would seem to be the type of arrangement Loader and White want, but the security managers (who control the security and who would need to convince their own managers) are the key to unlocking this.

Finally, and moving on to the enforcement of regulation, there are also issues about the use of principles-based, non-binding and thus non-enforceable, contracts. Within the context of private security there are also included areas where a simple MoU will not suffice. An example is front line police-type services such as public patrols. Local and national level public-private-partnerships have already illustrated this sensitivity (Crawford, Lister, & Blackburn, 2005). The response to this by Loader and White is a reference to the responsive regulation enforcement pyramid (Ayres & Braithwaite, 1992). It may be, however, as Paas (1994, p. 353) argues, 'The use of an enforcement pyramid to elicit cooperation of regulated firms seem too complicated for practical use.' Nonetheless, where cooperation is not forthcoming, despite threats and sanctions, the pyramid allows for licence revocation to stop errant security providers from operating and causing further harm.

Social solidarity (in the public interest?)

According to Loader and White (2017) the principle of 'social solidarity' pertains to the process of fostering connections between market transactions and the responsibilities of the members of a particular political community. By closely attending iniquitous and damaging social behavior in the market, one finds ways of compensating those 'injured'. Any regulator would then serve a dual purpose: preventing market failure, and acting as a motivator of human agency.

Project Griffin – a program in London with specialist trained private security officers available to assist police in the event of an emergency such as terrorist attack – is probably the most notable of those examples, and, although not without critique and room for improvement, it is easy to see its current and potential benefits to society (Sarre and Prenzler, 2011). The extensive statutory health and safety provisions which exist in the UK and EU also provide another example of how a public good 'health and safety' can be delivered by public and private actors through mandatory minimum standards of safety. In the UK, 'it is an employer's duty to protect the health, safety and welfare of their employees and other people who might be affected by their business. Employers must do whatever is reasonably practicable to achieve this' (Health and Safety Executive, n.d.). Such

provisions already cover security-related issues which might cause physical harm. So, for instance, if security operatives were guarding a venue such as a stadium that was already over-filled, the operatives, because of their health and safety responsibilities, would have a duty to intervene beyond their private space to stop more fans arriving and entering the venue.

Nevertheless, Loader and White are correct to raise the need for better legal mechanisms to enable and obligate private security to support the state in certain situations. Some countries already do so. In Spain for example there is an obligation to support the state in an emergency (Gimenez-Salinas, 2004). In Sweden, especially trained security guards can act as 'law enforcement stewards' under law 1980:580 §6 which states that:

> 'A law enforcement steward is subordinated a police officer. He or she is obliged to obey an order announced by a policeman in duty, unless it is obvious that the order does not concern the service as a law enforcement steward or that it is contrary to law or other constitution'.[6]

It is therefore possible to de-commodify in an instant parts of private security powers to serve in the interest of the public. It is also under consideration and development to extend this type of de-commodification even further in the case of major incidents such as terrorist attacks, etc.

The notion that commodification of security may be perilous is not new. Loader co-authored a book in 2007 making a case for commodifying – i.e. turning security into discrete goods tailored to individual, community and organizational preferences – having a negative influence on trust and solidarity as requirements for guaranteeing equal protection of all members of society (Loader & Walker, 2007). There are, however, at least three problems with this. One: society is made from discrete elements. These elements, whatever they may be – people, processes, technology, etc., – are nevertheless inexorably interrelated and consequently form various threads in society. Threads themselves are interrelated, with other more or less similar strands. Cohesion, equality and security are conditioned by how fine the resulting fabric is woven. Two: individual, community and organizational preferences should not be confused with individual, community and organizational *needs* (actual or legally required) that may or may not be the same. In short, objective needs and subjective wants are not necessarily the same. Three: arguing for a minimal standard level of protection for all members of society is an easy case to make, but for all individuals to have exactly the same security is simply impossible. Solidarity (in terms of security) is fostered by making sure

[6] As translated.

that no-one is left behind. We should strive to grant a minimal level of protection rather than to push at the top and wait for a trickle-down effect. Comprehensive regulation means simply not turning a blind eye to the potential pitfalls of letting the market run amok without regard for the public good. In that regard, it should be noted that before the private security industry was regulated in England and Wales in 2001 there were regular problems exposed of criminal infiltration in the industry, low standards of training (and in some cases no training) and incompetence (Button, 2007b; Button, 2012).

5. A less vague and utopian future model: the three pillars model

The above factors, we argue, drive the case for an enhanced and unified response to private security regulation, and they persist in the recognition of the powers vested in security providers, the scandals linked to misconduct, poor standards and abuse of power (Prenzler & Sarre, 2008; Sarre & Prenzler, 2009, see also Pashley & Cools, 2012). Available instruments for governance through civil and criminal law, market forces and self-regulation are more or less beneficial, but all fall short of providing a comprehensive regulatory framework. Nor are either of the instruments considered superfluous, but the case for a comprehensive model of regulation to be built upon three pillars is compelling. Given the intricacies of the contemporary private security industry, and the degree to which it is interwoven with public ambitions, a more complex (but not complicated) form of regulation is called for, one that intervenes at all stages of activity – planning, acting and output, where output includes both private and social goods. It is, however, important to note that whatever weight is afforded to the criticism of the alleged emphasis in the three pillars modelon a market driven neo-classical approach to regulation, it more resembles a management-based form of regulation. The three pillars model does not specify the technologies used, nor does it prescribe specific outputs in terms of social goals (cf. Coglianese & Lazer, 2003). Rather the task is to create a model of regulation within a new framework, one that is capable of adapting to an ever-changing environment and contemporary challenges by dynamically matching interventions to risk.

The central idea is that the model of regulation (delivering quality and equitable security) is built upon three separate but linked pillars, fusing the ideas of all three regulatory 'schools.' The pillars are described as 'regulatory,' 'distributive' and 'responsible.' We do not advocate for one body necessarily being responsible for all three; it could be a mixture. We do not offer a detailed outline of these pillars, rather the general principles. Some of our other work covers in much more depth the structures which can be built upon these foundations (See Button, 2008; Prenzler and Sarre,

2008). It should also be noted that the pillars will most likely be activated in differing proportions in different jurisdictions depending on community needs.

The regulatory pillar

First, there is the regulation of the private security sector which should be 'enhancing.' It should not only 'cleanse' the industry of 'bad apples', but also improve standards and apply to the wider private security sector (Button, 2012). This should also provide the foundations for higher non-compulsory standards (Button, 2007a; Prenzler and Sarre, 2008). Thus, the regulator should focus on raising standards while largely (but not completely) leaving the formation of partnerships to be managed primarily at a local level. Here regulation not only serves the public interest but also indirectly encourages partnerships by raising private security above the 'junior-partner' position through enhanced integrity and competency (Button, 2012; Shearing & Stenning, 1981).

The distributive pillar

Second, there need to be equitable opportunities to access security and address security inequality. There are ways to deal with it, for example through monies being transferred to less secure communities to purchase and enhance their own security, according to their needs. This can be seen in Zwlethemba and Toronto, for example (Johnston and Shearing, 2003; Rigakos, 2002). In the latter communities who had been largely abandoned by the Toronto police were able to purchase the security of Intelligarde who were able to significantly enhance the security of these housing estates (Rigakos, 2002). Consultation provides another means. For example, the security-focused Travel Safe Program that generated major improvements in commuter safety in the Australian state of Victoria in the 1990s was designed with extensive stakeholder input including through community consultative forums (Carr & Spring, 1993). The more demanding task is to find the means to secure the funding to launch such initiatives. Also, the unequal buying power, pushing a distribution of security inverse to risk (Hope, 2000) is only a problem if the lowest level of security does not meet the standards of the least needy. There are many ways this could be achieved. The essence of this pillaris that communities with less security should be provided with resources to enhance it.

The responsibility pillar

Third, there are structures and responsibilities that can also be used to align the private security industry with public interest, for example, legal responsibilities that support the public sector in the event of a crime emergency. This currently happens in Spain and Sweden (Gimenez-Salinas, 2004).

Where in Sweden, a police officer can immediately deputise any private security steward (ordningsvakt) to aid and support the police. The Private security steward is by law bound to comply with the police and prioritise public interests responsibilities.The related issue of health and safety – which also cuts across security – is already established in the EU and many other countries as a legal requirement. All organizations, whether public, private or voluntary, are obliged to meet a minimum standard. This could provide a model to emulate, building minimum standards for *all* security.

Conclusion

We recognize the significant contribution of Loader and White to developing ideas for more effective governance and regulation of private security personnel and the contribution of private security to enhancing the common weal. The regulation of private security is a challenging concept, and those pushing for improvement through change should be commended for doing so. For the improvements to be as effective as possible it is important to keep an open mind to the protagonists of change and avoid overly dichotomizing their voices. The article by Loader and White treads dangerously close to being guilty of the latter.

As our response has shown, the classification and description of the schools of regulatory agendas does have its caveats. At the same time, many of the fundamental ideas suggested by Loader and White (2017) are embraced here. Some of them are incorporated in our proposed 'three pillars' model of private security regulation. The literature and research points towards the need for a new regulatory framework. We argue for three pillars: a regulatory pillar that enhances the wider private security sector, a distributive pillar that addresses security inequality, and, lastly, a responsibility pillar designed to align the private security industry with public interests. It is our hope that the introduction of such a model into the marketplace of ideas will nurture further constructive collaboration between all of those engaged in this topic, one where an effective regulatory framework can be developed, debated and tested.

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